

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

FILED
OCT 14, 1981

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CHRISTOPHER LLOYD GARRISON and :
ELLEN LEE GARRISON, :
 :
 Plaintiffs, : COMPLAINT
 :
 -against- : (Plaintiffs Demand
 : A Trial By Jury)
 :
 JOSEPH FLANNAGAN, BARRY FLANNAGAN, :
 FRAN FLANNAGAN, STEVEN FLANNAGAN, :
 MARK MCGREGOR, ERNEST SIMPSON, :
 JASON VAN STEEMBURG, JOSEPH THOMAS, :
 KEVIN FLYNN and PAULETTE COOPER, :
 :
 Defendants. :
 :
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Plaintiffs CHRISTOPHER LLOYD GARRISON and ELLEN LEE GARRISON, by their attorneys, complaining of the defendants, allege as follows:

The Parties

1. Plaintiff CHRISTOPHER LLOYD GARRISON is a citizen of the United States of America and a resident of the Commonwealth of Massachusetts.

2. Plaintiff ELLEN LEE GARRISON is a citizen of the United States of America and a resident of the Commonwealth of Massachusetts.

3. At all times pertinent hereto, plaintiff CHRISTOPHER LLOYD GARRISON and plaintiff ELLEN LEE GARRISON were, and still are, married to each other.

21. It was a further part of the aforesaid conspiracy that the defendants and the named co-conspirators, who are not defendants herein, would seek to intimidate, then to interfere with, and finally to prevent the plaintiffs from traveling from state to state.

22. In furtherance of the aforesaid conspiracy, and to effect the objects thereof, the following overt acts, amongst others, were committed:

(a) On August 9, 1980, upon entering the home of HERBERT LEBOWITZ and SONIA LEBOWITZ, located at 193 Corinth Street, North Adams, Massachusetts, plaintiff CHRISTOPHER LLOYD GARRISON and plaintiff ELLEN LEE GARRISON were met by co-conspirators HERBERT LEBOWITZ, SONIA LEBOWITZ and ANDREW LEBOWITZ and the defendant JOSEPH FLANNAGAN.

(b) Immediately afterward the defendants FRAN FLANNAGAN, STEVEN FLANNAGAN, MARK MCGREGOR, ERNEST SIMPSON, JASON VAN STEEMBURG and JOSEPH THOMAS entered the room, and surrounded the plaintiffs.

(c) Defendant JASON VAN STEEMBURG stood next to plaintiff CHRISTOPHER LLOYD GARRISON, menacingly, in a fixed karate stance.

(d) Defendant JOSEPH FLANNAGAN informed the plaintiffs that he intended to "deprogram" them so that they would renounce their religious affiliations with the Church of Scientology and abandon their religious beliefs.

(e) The defendants and the named co-conspirators, who are not defendants herein, forcibly prevented the plaintiffs

from leaving the home of HERBERT LEBOWITZ and SONIA LEBOWITZ, when they arose to walk outside to their automobile.

(f) In the early morning hours of August 10, 1980, the defendants and the named co-conspirators, who are not defendants herein, forcibly removed the plaintiffs from the home of HERBERT LEBOWITZ and SONIA LEBOWITZ, and thrust them against their will into the back of a truck that was parked outside the house.

(g) Thereafter the defendants drove the plaintiffs against their will to a remote cottage located in Dalton, Massachusetts.

(h) The defendants held the plaintiffs captive in the aforesaid cottage for approximately one and one-half days. The plaintiffs were kept under guard at all times. The plaintiffs' bedroom, adjoining the living room, lacked a door. Slabs of wood covered the windows of the bedroom and the bathroom.

(i) Throughout the entire period that the plaintiffs were held captive, the defendants ridiculed the plaintiffs' religion and vilified its founder, attempting to induce the plaintiffs to renounce their religious beliefs.

(j) In furtherance of their unlawful scheme, the defendant JOSEPH FLANNAGAN read from and exhibited to the plaintiffs written materials obtained from the defendant PAULETTE COOPER.

(k) Despite the plaintiffs' requests that the deprogramming end, the defendant JOSEPH FLANNAGAN refused, informing the plaintiffs that they would endure it, like it or not, and that the defendants would continue to detain the plaintiffs against their will.

(l) In furtherance of their unlawful scheme, and as part of their conspiracy to induce the plaintiffs to repudiate their religious affiliations and beliefs, the defendants repeatedly invited the plaintiffs to confer with the defendants KEVIN FLYNN and PAULETTE COOPER, among other persons, and to review certain documents, for further deprogramming.

(m) During the evening of August 10, 1980, the defendant BARRY FLANNAGAN traveled to New York City, where he obtained documents from the defendant PAULETTE COOPER for use in the defendants' continuing attempt to deprogram the plaintiffs, returning early the next morning to the cottage where the plaintiffs were held captive.

(n) On August 22, 1980, the defendant JOSEPH FLANNAGAN wrote a letter to the plaintiffs and sent them certain documents as part of the continuing attempt to force them to renounce their religious affiliations and beliefs.

(o) On or about September 8, 1980, in Boston, Massachusetts, the defendant KEVIN FLYNN implied that the plaintiffs' imminent arrest for crimes relating to their association with the Church of Scientology of Boston impended unless they agreed to join as plaintiffs in a class action then pending against the aforesaid Church - an action in which MICHAEL J. FLYNN, the brother of the defendant KEVIN FLYNN, represented the plaintiffs - all of the foregoing statements made in furtherance of the conspiratorial scheme to intimidate the plaintiffs into renouncing their religious beliefs and affiliations.

(p) On or about October 10, 1980, the defendant KEVIN FLYNN went to the private school in Belmont, Massachusetts, where plaintiff ELLEN LEE GARRISON is employed as Executive Director, and reiterated the threat to the plaintiffs of an imminent criminal prosecution unless they renounced their religious beliefs and affiliations.

23. As a result of the conspiracy and acts complained of herein, the plaintiffs suffered physical injuries as well as mental and emotional distress.

24. As a further result of the aforesaid conspiracy and the acts complained of herein, the plaintiffs were denied, intentionally, maliciously and wrongfully, the equal protection of the laws and the enjoyment of their rights, privileges and immunities as citizens of the United States of America and of the Commonwealth of Massachusetts, including, but not limited to, freedom of religion, freedom of association and freedom of travel.

25. In consequence of the acts complained of herein, the plaintiffs have suffered actual damages in the amount of one million (\$1,000,000) dollars.

26. In consequence of the acts complained of herein, punitive damages in the sum of one million (\$1,000,000) dollars should be awarded in favor of the plaintiffs, together with an award of attorney's fees as provided by statute.